

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jorge A Astudillo Zurita Debtor(s) Discover Bank Movant vs. Jorge A Astudillo Zurita Respondent(s)	BK NO. 24-13184 AMC Chapter 13 Hearing Date: 12/11/24
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**OBJECTION OF DISCOVER BANK
TO CONFIRMATION OF CHAPTER 13 PLAN**

Discover Bank (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On or before Bar Date of November 19, 2024, Secured Creditor will file a secured proof of claim setting forth an estimated pre-petition arrears in the amount of \$1,947.22.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$1,947.22, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Discover Bank, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: October 21, 2024

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